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and

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*Attorneys for Defendants,  
 Walmart Inc. and Jetson Electric Bikes, LLC*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH )  
 Individually and as Parent and Legal Guardian )  
 of W.W., K.W., G.W., and L.W., minor children )  
 and MATTHEW WADSWORTH, )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 WALMART INC. and )  
 JETSON ELECTRIC BIKES, LLC, )  
 )  
 Defendants. )

Case No. 2:23-cv-00118-NDF

**DECLARATION OF  
 EUGENE M. LAFLAMME IN  
 SUPPORT OF REPLY TO  
 MOTION FOR SUMMARY  
 JUDGMENT**

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I, Eugene M. LaFlamme, state as follows:

1. I am an attorney at McCoy Leavitt Laskey LLC located in Waukesha, Wisconsin.
2. I am one of the attorneys of record for Defendants, Jetson Electric Bikes, LLC and Walmart Inc., admitted *pro hac vice* on August 24, 2023.
3. Attached as Exhibit 1 are the pertinent portions of Green River Sheriff Department's Detective Sergeant Jeff Sheaman's deposition taken on November 16, 2023.
4. Attached as Exhibit 2 are the pertinent portions of R. Pasborg's deposition taken on May 15, 2023.
5. Attached as Exhibit 3 are the pertinent portions of Plaintiff Stephanie Wadsworth's deposition taken on February 27, 2024.
6. Attached as Exhibit 4 are the pertinent portions of Plaintiffs' fire cause expert Derek King's deposition taken on August 19, 2024.
7. Attached as Exhibit 5 is a true and correct copy of NFPA 921 (2021 ed.) section 6.1.5, and 6.3.21.10.4.1.
8. Attached as Exhibit 6 are the pertinent portions of Plaintiffs' fire origin expert Michael Schultz's deposition taken on September 10, 2024.
9. Attached as Exhibit 7 are the pertinent portions of Green River Fire Department Assistant Fire Chief Bill Robinson's deposition taken on November 15, 2023.
10. Attached as Exhibit 8 is a true and correct copy of Green River Sheriff Department's Detective Sergeant Jeff Sheaman's report dated February 1, 2022.
11. Attached as Exhibit 9 are the pertinent portions of Jetson representative Sam Husain's deposition taken on May 17, 2024.
12. Attached as Exhibit 10 are the pertinent portions of the Donwell Complaint.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: December 23, 2024



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Eugene M. LaFlamme